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*Proposed Counsel to the Debtors  
 and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
 EASTERN DISTRICT OF NEW YORK**

	)	Chapter 11
	)	
	)	Case No. 8-19-76260-est
	)	Case No. 8-19-76263-est
In re:	)	Case No. 8-19-76267-est
	)	Case No. 8-19-76268-est
Absolut Facilities Management, LLC, <i>et al.</i>	)	Case No. 8-19-76269-est
	)	Case No. 8-19-76270-est
Debtors. <sup>1</sup>	)	Case No. 8-19-76271-est
	)	Case No. 8-19-76272-est
	)	
	)	(Joint Administration Requested)
	)	

**SUPPLEMENTAL DECLARATION OF MICHAEL WYSE  
 REGARDING CLOSURE OF ORCHARD PARK FACILITY**

I, Michael Wyse, hereby declare under penalty of perjury:

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Absolut Facilities Management, LLC (1412); Absolut Center for Nursing and Rehabilitation at Allegany, LLC (7875); Absolut Center for Nursing and Rehabilitation at Aurora Park, LLC (8266); Absolut Center for Nursing and Rehabilitation at Gasport, LLC (8080); Absolut at Orchard Brooke, (1641); Absolut Center for Nursing and Rehabilitation at Orchard Park, LLC (8300); Absolut Center for Nursing and Rehabilitation at Three Rivers, LLC (8133); and Absolut Center for Nursing and Rehabilitation at Westfield, LLC (7924).

1. I am over the age of 18 and am authorized to submit this Declaration on behalf of the Debtors. If called upon to testify, I could and would testify competently to the facts set forth in this Declaration.

2. I am the Chief Restructuring Officer (“**CRO**”) of Absolut Facilities Management, LLC, doing business as Absolut Care LLC, (“**AFM**”), a New York limited liability company with an office located in Roslyn Heights, New York, and of each of the other above-captioned debtors and debtors-in-possession (collectively, with AFM, the “**Debtors**”).

3. I am knowledgeable and familiar with the Debtors’ day-to-day operations, business and financial affairs, books and records, and the circumstances leading to the commencement of these chapter 11 cases (the “**Chapter 11 Cases**”). Except as otherwise indicated herein, the facts set forth in this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me by employees of the Debtors or the Debtors’ advisors, or my opinion, which itself would be based on my experience, knowledge, and information concerning the Debtors’ operations. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

4. I submitted a prior declaration (the “**First Day Declaration**”) in connection with the commencement of these Chapter 11 Cases. This supplemental declaration is being submitted with regard to the closure of one of the Debtors’ facilities.

5. As described in the First Day Declaration, the Debtors operate six skilled nursing facilities and one assisted living facility in the state of New York, employing approximately 975 people throughout New York state. Debtor Absolut Center for Nursing and Rehabilitation at Orchard Park, LLC owns and operates the skilled nursing facility in Orchard Park, New York (the “**Orchard Park Facility**”). The Orchard Park Facility has 202 beds and employs approximately

234 people. Its annual revenues for fiscal year 2018 were \$18,102,790.61 and for 2017 were \$18,583,140.48.

6. Prior to the Petition Date, the Debtors filed a closure plan for the Orchard Park Facility, with the New York State Department of Health (the “**DOH**”). After the commencement of these cases, on September 11, 2019, the DOH notified the Debtors that the closure plan was approved.

7. Prior to receipt of approval from the DOH applicable non-bankruptcy law specifically prohibits any disclosure of the filing of the closure plan or any other information related to the Debtors’ intent to close. Accordingly, and in order to comply with applicable law, the First Day Declaration did not refer to the closure.

8. In accordance with the terms of the approved closure plan, the Debtors will immediately begin implementing the closure plan, in order to wind down and terminate operations at the Orchard Park Facility.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: September 11, 2019  
New York, New York

/s/ Michael Wyse  
Michael Wyse  
Chief Restructuring Officer